## NTERVENTION



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**COMMISSIONERS** 

**GARY PIERCE** 

**BOB BURNS** 

**BRENDA BURNS** 

BOB STUMP, CHAIRMAN

**SUSAN BITTER-SMITH** 

IN THE MATTER OF THE

ENERGY CORPORATION.

**REORGANIZATION OF UNS** 

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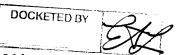
BEFORE THE ARIZONA CORPORATION COMMISSION

2014 MAR 21 P 3: 57

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Arizona Corporation Commission DOCKETED

MAR 2 1 2014



Docket No. E-04230A-14-0011 Docket No. E-01933A-14-0011

MOHAVE ELECTRIC COOPERATIVE, INCORPORATED'S MOTION TO INTERVENE

## ORIGINAL

Mohave Electric Cooperative, Incorporated ("Mohave") through undersigned counsel and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission (the "Commission") for an order allowing Mohave to intervene in the above-captioned proceeding. In support of its motion, Mohave states as follows:

- 1. Mohave is a public service corporation providing electric service to customers within the state of Arizona and adjacent to UNS Electric, Inc.'s ("UNS Electric") certificated area.
- 2. UNS Electric is included as part of the reorganization, although the Notice of Reorganization was opened under the UNS Electric docket (E-02404A).
- 3. Mohave will be directly and substantially affected by this proceeding because UNS Electric and Mohave have several inter-relationships, such as Borderline Agreements, joint use of some facilities, facilities in close proximity to each other, facilities that cross or use the same rights-of-way and potential competition for uncertificated areas located in northwest Arizona.
- 4. The name, address, telephone number, facsimile number and e-mail address of the attorneys and representatives for Mohave upon whom service of all documents is to be

1	made are:		
2	Michael A. Curtis		
3	William P. Sullivan Larry K. Udall Peggy Gillman		
4	Curtis, Goodwin, Sullivan, Manager of Public Affairs and Energy		
5	Udall & Schwab, P.L.C. Services 501 East Thomas Road Mohave Electric Cooperative, Incorporated		
6	Phoenix, Arizona 85012 P.O. Box 1045 Phone: 602-393-1700 Bullhead City, Arizona 86430		
7	Fax: 602-393-1703 Phone: 928-758-0575		
8	E-mail: mcurtis401@aol.com Fax: 928-763-3315 wsulllivan@cgsuslaw.com E-mail: pgillman@mohaveelectric.com		
	ludall@cgsuslaw.com		
9	5. No other party can represent Mohave's specific interests in these		
10			
11	proceedings.		
12	6. Mohave's intervention will not unduly broaden the issues from those		
13	already raised by the UNS reorganization.		
14	WHEREFORE, Mohave respectfully requests that the Commission grant its		
15	Motion to Intervene in the above-captioned matter.		
16	DATED this 21 <sup>st</sup> day of March, 2014.		
17			
18	CURTIS, GOODWIN, SULLIVAN, UDALL & SCHWAB, P.L.C.		
19	Jan 110011		
20	By: Michael A. Curtis		
21	William P. Sullivan Larry K. Udall		
22	501 East Thomas Road		
23	Phoenix, Arizona 85012-3205 Attorneys for Mohave Electric Cooperative,		
24	Incorporated		
25			
-			

1	PROOF OF AND CERTIFICATE OF MAILING		
3	* *	1 <sup>st</sup> day of March, 2014, I caused the foregoing ration Commission by delivering the original and	
4	Docket Control		
5	Arizona Corporation Commission		
6	1200 West Washington Phoenix, Arizona 85007		
7	COPY of the foregoing hand delivered/		
8	mailed this 21 <sup>st</sup> day of March, 2014 to:		
9	Jane L. Rodda	Patricia Lee Refo	
10	Administrative Law Judge Arizona Corporation Commission	Snell & Wilmer, LLP One Arizona Center	
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16	Janice Alward		
17	Chief Counsel, Legal Division Arizona Corporation Commission	C. Webb Crockett Patrick J. Black	
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18	Phoenix, Arizona 85007	2394 East Camelback Road, Suite 600	
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21	Tucson, Arizona 85702	P.O. Box 1448 Tubac, Arizona 85646	
22	Michael Patten	Attorneys for Noble Americas Energy	
23	Roshka Dewulf & Patten, Plc One Arizona Center	Solutions LLC	
24	400 East Van Buren Street, Suite 800 Phoenix, Arizona 85004		
25	Attorneys for UNS Energy Corporation		

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